

TIMOTHY A. LUKAS, ESQ.
Nevada Bar No. 4678
HOLLAND & HART LLP
5441 Kietzke Lane, Second Floor
Reno, Nevada 89511
Tel: (775) 327-3000/Fax: (775) 786-7169
Email: ecflukast@hollandhart.com

Attorney for Good 2 Go Stores LLC

UNITED STATES BANKRUPTCY COURT

DISTRICT OF NEVADA

In Re:

CASH CLOUD, INC., dba COIN CLOUD,

Debtors.

Case No. 23-10423-MKN
Chapter 11

**GOOD 2 GO STORES LLC'S
RESPONSE TO DEBTOR'S OMNIBUS
OBJECTION TO LATE FILED AND
NON-COMPLIANT ADMINISTRATIVE
EXPENSE CLAIMS**

Hearing Date: October 19, 2023
Hearing Time: 10:30 a.m.

Good 2 Go Stores LLC, by and through its undersigned counsel, hereby responds to Debtor's objection to its administrative claim [ECF 1277] as follows:

POINTS AND AUTHORITIES

I. FACTUAL STATEMENT

1. Good 2 Go Stores LLC entered a Master Host Agreement (the "Agreement") with Debtor on February 2, 2022.

2. Debtor filed its Chapter 11 Voluntary Petition on February 7, 2023.

3. On June 14, 2023, Debtor filed its Twelfth Omnibus Motion for Entry of Order Approving Rejection of Executory Contracts and Unexpired Leases [ECF 684] (the "Rejection Motion"). This omnibus motion included the unexpired leases between the debtor and Good 2 Go Stores LLC.

4. A hearing on the Rejection Motion was held on July 20, 2023 and an order granting the motion was entered July 26, 2023 [ECF 945].

5. Good 2 Go Stores LLC filed its Administrative Claim on August 10, 2023 [ECF 1067].

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6. The Order Establishing Administrative Claim Bar Date [ECF 823] states that any person or entity holding or asserting an administrative expense claim against the Debtor that accrued or arose on or between the Petition Date and July 20, 2023 (the “Interim Period”) must file their administrative claim no later than 5:00 p.m. on July 20, 2023 (“Administrative Claim Bar Date”).

7. Debtor’s Omnibus Objection to Late Filed and Non-Complaint Administrative Expense Claims was filed on September 20, 2023 (the “Claim Objection”).

II. ARGUMENT

By its Claim Objection, Debtor claims Good 2 Go Stores LLC’s Administrative Claim was untimely. However, the Order on the Rejection Motion wasn’t entered until after the Administrative Claim Bar Date. Good 2 Go Stores LLC did not have an administrative claim to assert until after their leases with the Debtor had been rejected, i.e., July 26, 2023 and therefore, Good 2 Go Stores LLC’s administrative claim accrued or arose after the Interim Period as provided in the Order Establishing Administrative Claim Bar Date.

III. CONCLUSION

Based on the foregoing, Good 2 Go Stores LLC respectfully requests the Court allow its administrative claim in the amount of \$27,207.00.

DATED this 5th day of October, 2023.

HOLLAND & HART LLP

By: /s/ Timothy A. Lukas

Timothy A. Lukas, Esq.
5441 Kietzke Lane, 2nd Floor
Reno, NV 89511
Telephone: (775)327-3023
Facsimile: (775)786-6179
ecflukast@hollandhart.com

Counsel for Good 2 Go Stores LLC

HOLLAND & HART LLP
5441 Kietzke Lane, Second Floor
Reno, Nevada 89511
Tel: (775) 327-3000/Fax: (775) 786-6179

CERTIFICATE OF SERVICE

I am, and was when the herein described mailing took place, a citizen of the United States, over 18 years of age, and not a party to, nor interested in, the within action; that on October 5, 2023,

I served a true and correct copy of the foregoing **Response** in the following manner:

☒ (BY NOTICE OF ELECTRONIC FILING) Under Administrative Order 02-1 (Rev. 8-31-04) of the United States Bankruptcy Court for the District of Nevada, the above-referenced document was electronically filed on the date hereof and served through the Electronic Case Filing System of the United States Bankruptcy Court to the parties in the case.

☐ (UNITED STATES MAIL) By depositing a copy of the above-referenced document for mailing in the United States Mail, first class postage prepaid, at Reno, Nevada, to the parties listed on the attached service list, at their last known mailing addresses, on the date above written.

☐ (OVERNIGHT COURIER) By depositing a true and correct copy of the above-referenced document for overnight delivery via Federal Express, at a collection facility maintained for such purpose, addressed to the parties on the attached service list, at their last known delivery address, on the date above written.

☐ (FACSIMILE) That I served a true and correct copy of the above-referenced document via facsimile, to the facsimile numbers indicated, to those persons listed on the attached service list, on the date above written.

DATED: October 5, 2023.

_____/s/ Cyndy Arnold

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